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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON  
DISCOVERY FOR DECEMBER 11, 2024  
DISCOVERY MANAGEMENT  
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the December 11, 2024, Discovery Management Conference (“DMC”).

**I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action**

**A. Meta v. State AGs**

**1. Format of Briefing on State Agency Document Productions**

Under DMO 12, December 9 is the last date to file discovery letter briefs re: disputes concerning the production of state agency documents (Rule 34 requests or subpoenas) for 29 States. ECF 1380 at 2. The State AGs have proposed filing 5-page letter-briefs (up to 2.5 single-spaced pages per side) for each of the up-to-29 State AGs at issue, attached to a single ECF entry for the Court’s convenience. Meta has proposed to submit a common-issue brief of up to 5 single-spaced pages per side (10 pages total), followed by State-specific appendices of 0.5 single-spaced pages per side (1 page total per State). The State AGs filed an opposed administrative motion on December 4 (ECF 1407). Meta intends to file its response promptly.

**2. Meta’s Commitment re Further RFPs on the State AGs.**

Meta commits that it will limit service of additional RFPs on the MDL AGs with two qualitative exceptions: (1) Meta reserves the right to serve additional RFPs on the AGs for materials that fall outside the Relevant Time Period; and (2) Meta reserves the right to serve follow-up RFPs on the AGs to obtain materials concerning new developments, facts, or issues that may come to light in discovery or otherwise. The Parties request that the Court order these limitations, as it did with respect to the State AGs and PI/SD Plaintiffs. ECF 969 (DMO 7) at 2-3, 4.

**B. Meta v. Plaintiffs**

**1. Joint stipulation re Plaintiffs’ request for compensation information for 11 Meta deponents [ECF 1318]**

1 The Parties have reached an agreement resolving their letter-brief regarding Plaintiffs' request  
2 for compensation information in documentary form for 11 Meta deponents (ECF 1318). The Parties  
3 expect to file a stipulation memorializing their agreement before the December 11 DMC.

4 **2. Update on Mr. Zuckerberg production**

5 In the Order Resolving Joint Letter Brief Regarding PI/SD Plaintiffs RFPs 317, 325, 335, 344-  
6 346, and 357 as to Meta, the Court ordered Meta to "promptly search those documents for which Mr.  
7 Zuckerberg is the custodian, using only the 'meaningful social interaction' search term, limited only to  
8 documents dated within the time period from December 31, 2017 to February 28, 2018, and to process  
9 and produce with reasonably prompt diligence any non-privileged documents which result from that  
10 time-limited search," and to report on the progress of this production in the December DMC Statement.  
11 Meta reports that it has performed the search ordered by the Court and has identified ten documents that,  
12 if non-privileged, will be produced.

13 **3. Meta and Plaintiffs' further agreement regarding hyperlinks**

14 Meta and the Personal Injury ("PI"), School District and Local Government Entity ("SD"), and  
15 Attorney General ("AG") Plaintiffs (collectively "Plaintiffs") reached the following additional  
16 agreement regarding hyperlinks:

17 1. At the September 12, 2024 Discovery Management Conference, the Court ordered a process for  
18 the production of hyperlinked documents, whereby the Plaintiffs could collectively make a weekly  
19 request of Meta for 200 individual hyperlinks or hyperlinks from 50 documents, whichever was fewer,  
20 that Meta would be obligated to produce within 30 days (ECF 1189). The Court did not address whether,  
21 as a general matter, there would be terms for the expedited production of hyperlinks relevant to  
22 depositions taking place within 30 days of a request.

23 2. Since the Court's order, many requests for hyperlinked documents have pertained to depositions  
24 within less than 30 days of a request. The Parties recognize that there is a need to establish a process for  
25 the expedited production of hyperlinked documents so that all Parties can plan accordingly.

26 3. Since the Court's order and through the course of depositions, the Parties have also recognized  
27 the need to clarify questions related to the authentication of documents with embedded hyperlinks.  
28

4. To that end, Meta confirms that: (I) it will not object in depositions on authenticity or “completeness” grounds if a document is presented to a deponent without all embedded hyperlink content presented with the document; and (II) to the extent Plaintiffs wish to present a document along with the hyperlinked content to a witness, it will not object to the extent Meta has confirmed the “link” between the document and the hyperlinked content, whether by (a) identifying or producing the hyperlinked content in response to a hyperlink request from Plaintiffs, or by (b) confirming that the Plaintiffs had correctly identified hyperlinked content in the existing productions.

5. The Parties have further agreed that, consistent with the Court’s prior rulings on this issue, Meta does not agree to produce non-responsive hyperlinks (ECF 1189).

6. The Parties have further agreed, pending the Court’s consent, to the following timeline for requesting hyperlinked documents and expedited timeline for the production of hyperlinked documents relevant to a deposition within 30 days:

a) By 5 p.m. ET Friday, Plaintiffs can send Meta a list of up to 50 hyperlinks for which they want Meta to confirm “yes, in production” or “no, not in production.” Plaintiffs will identify the specific document they think the hyperlink is pointing to in the production by Bates number, or, Plaintiffs will confirm they have attempted to locate such documents but were unable following reasonable investigation to do so, in which case Meta will count those requested hyperlinks towards Plaintiffs’ weekly allotment of 200 individual hyperlinks or hyperlinks from 50 documents, whichever is fewer;

b) By the close-of-business Tuesday, Meta confirms “yes” or “no” for the 50 hyperlinks received the previous Friday. Provided Plaintiffs have identified the correct document, the documents that Plaintiffs correctly identify as being associated with the document that they’re linked to do not count against Plaintiffs’ weekly allotment of up to 200 hyperlinks. If Plaintiffs want any of the “no’s,” they can add those to their weekly allotment of up to 200 hyperlinks;

c) By 5 p.m. ET Wednesday, Plaintiffs will send Meta their weekly allotment of up to 200 hyperlinks. “Meta may produce responsive, non-produced, and non-privileged internal Meta documents found at hyperlinks contained within Meta produced documents within 30 days” (ECF 1185);

1 d) Plaintiffs agree to make it clear in their Friday and Wednesday hyperlink requests what  
2 Deposition they are requesting the hyperlink for, so both Parties can track the limits set forth in  
3 this agreement.

4 and

5 e) For hyperlinks related to deponents (“Deposition Hyperlinks”), Meta agrees to continue  
6 prioritizing Deposition Hyperlinks for identification and production, and will endeavor to  
7 identify or produce such hyperlinks according to the following schedule:

8 i) If a deposition is scheduled more than 30 days after the receipt of a related request  
9 for hyperlinks, Meta will endeavor to identify and produce requested hyperlinks for that  
10 deponent within 30 days per the Court’s order;

11 ii) During the course of deposition preparation (i.e., less than 30 days but greater  
12 than 14 days), Plaintiffs may request up to 25 hyperlinks 25 days before the deposition  
13 and up to another 25 hyperlinks no less than 14 days before the deposition (i.e., 50  
14 hyperlinks total) and Meta will endeavor to identify and produce hyperlinks within 48  
15 hours before the deposition, provided Plaintiffs limit such requests to custodial  
16 documents for the deponent and/or documents sourced to Meta Platforms; and

17 iii) If during the course of final deposition preparation (i.e., less than 14 days but  
18 greater than 7 days), Plaintiffs realize they have missed a hyperlinks for a deponent,  
19 Plaintiffs may request up to 5 hyperlinks and Meta will endeavor to identify and produce  
20 hyperlinks within 24 hours before the deposition, provided Plaintiffs limit such requests  
21 to custodial documents for the deponent and/or documents sourced to Meta Platforms.

22 iv) All Deposition Hyperlinks requests will count towards the weekly allotment of up to  
23 200 hyperlinks.

24 v) Parties agree to meet and confer regarding adjustments around holidays if these  
25 holidays fall within 30 days of a scheduled deposition.

26 **C. YouTube and PI/SD Plaintiffs**

27 1. Update Regarding Court Order ECF 1294 Re: RFP Nos. 16 and 18:  
28

The parties report that YouTube has completed its consultations with 13 of the 15 custodians that Plaintiffs identified pursuant to Dkt. No. 1294 (the parties agreed that YouTube would not consult the other two custodians, who are former employees). The parties continue to meet and confer to discuss YouTube's search—beyond its consultations with custodians—for additional unproduced non-privilege documents responsive to RFP Nos. 16 and 18.

## **II. Administrative Issues that Are Disputed or Require Court Action**

The Parties report that there are no disputed administrative issues or issues requiring Court action at this time.

## **III. Ripe Disputes for Which Joint Letter-Briefs (“JLBs”) Have Already Been Filed or Will Be Filed Imminently**

### **A. Meta v. PI/SD and/or State AGs Disputes**

1. Meta's privilege determination in connection with deposition of Miki Rothschild (Joint Letter Brief filed on November 25, 2024 (ECF 1375)).
2. Relevant time period for Meta discovery in JCCP (Joint Letter Brief to be filed on December 6, 2024).
3. State agency discovery disputes (Joint Letter Briefs to be filed by December 9, 2024).
4. Questioning of Meta Deponents re Compensation (Joint Letter Brief to be filed by December 10, 2024).

### **B. Snap v. PI/SD Disputes**

1. Whether Plaintiffs' pending interrogatories exceed the Court's limits (Joint Letter Brief to be filed on December 9, 2024).

### **C. TikTok v. PI/SD Disputes**

1. Whether Plaintiffs' pending interrogatories exceed the Court's limits (Joint Letter Brief to be filed on December 6, 2024).

### **D. Defendants v. Clevenger PI Bellwether Plaintiff**

1. Dispute concerning Defendants' request to depose expert regarding Clevenger device (Joint Letter Brief to be filed on December 5, 2024).

#### **IV. Unripe Disputes**

##### **A. Meta and Snap Defendants v. Plaintiffs**

1. Stipulated Source Code Protective Order.

##### **B. Defendants v. PI Bellwether Plaintiffs**

1. Parent/witness attendance at depositions.
2. Depositions of witnesses identified on PI Plaintiffs' initial disclosure lists.
3. RFPs held in abeyance by JCCP plaintiffs.
4. Responses/updates to PI Bellwether Common Interrogatories No. 2.
5. Process for third parties M.S. and R.T. to search for and produce responsive documents.
6. Proposed Rule 45 subpoena to Microsoft for a PI Bellwether's GroupMe account.
7. Defendants' productions of structured data responsive to PI Bellwether-specific RFPs.

##### **C. Defendants v. SD Bellwether Disputes**

1. Dekalb, Jordan, and St. Charles District-specific RFPs.
2. Baltimore custodians.
3. Preservation/collection and litigation hold issues.

##### **D. Meta v. PI/SD and/or AG Plaintiffs**

1. Meta's response to Interrogatory No. 1.
2. Meta's privilege log.
3. Dispute between SD Plaintiffs and Meta concerning RFP Nos. 3 and 9 from Set A.
4. Length of depositions of certain Meta executives.
5. Meta's responses to Plaintiffs' Second Set of Interrogatories.
6. Meta's written interrogatory responses from Meta Related Actions.

##### **E. Meta v. State AGs**

1. State AGs' responses and objections to Meta's First Set of Interrogatories.

2. Limits on Meta’s depositions of State AGs and state agencies.
3. Meta’s response to the State AGs’ RFPs, including RFP Nos. 64, 67, 99, 102, 112, 148-150, 151-153, 159, 160, 161, 162-163, 164, 166-169, 174, and 175.

**F. YouTube v. PI/SD Plaintiffs**

1. Non-Custodial Sources [ECF 1246].
2. RFPs (Set 3 [Nos. 37, 50], Set 4 [No. 56], Set 5 [Nos. 81-87], Set 6 [Nos. 103-109, 111-112], Set 10 [search terms and time period]).
3. One deponent-specific document production [time period].
4. Second Set of Interrogatories.

**G. TikTok v. PI/SD Plaintiffs**

1. TikTok’s privilege logs and metadata relating to privilege assertions.
2. SD RFP Set A.
3. RFP 295, 296 and 282 (Foreign Investigations).
4. Preservation/collection and litigation hold issues.
5. Timing of TikTok’s production of recalled lark chats.

**H. Snap v. PI/SD Plaintiffs**

1. Snap’s production of employee communications via Snap.
2. Snap’s privilege redactions of information related to users under the age of 13.
3. Snap’s identification of a date for Rule 30(b)(6) deposition regarding age verification and age inference.



Respectfully submitted,

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By: /s/ Lexi J. Hazam

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 4, 2024

By: /s/ Ashley M. Simonsen